

EQUALITY CALIFORNIA



March 14, 2018

VIA E-MAIL: OIRA_submission@omb.eop.gov

Agency Information Collection Activities; Submission for OMB Review; Comment Request; Redesign of Existing Data Collection; National Longitudinal Survey of Older Americans Act Participants (NLSOAAAP)

Attn: OMB Desk Officer for ACL

On behalf of Equality California and our 800,000 members, we appreciate the opportunity to submit comments regarding the redesigned National Longitudinal Survey of Older Americans Act Participants (NLSOAAAP) and to strongly urge OMB to require the Administration for Community Living (ACL) to keep questions related to gender identity on its surveys.

Equality California is the nation's largest statewide lesbian, gay, bisexual, transgender and queer (LGBTQ) civil rights organization and is dedicated to creating a fair and just society. We work within California, at the Federal level, and directly with other states to win and protect full equality for LGBTQ people through education, electoral, advocacy and mobilization programs to achieve our mission.

The nation's LGBTQ senior population is expected to double by 2030, as the baby boomer generation ages. LGBTQ older adults spent much of their early years in a climate of widespread discrimination, harassment, rejection and anti-LGBTQ violence. The combined impact of stigma and prejudice -- both past and present -- affects LGBTQ seniors' overall health and outlook. LGBTQ seniors are often isolated because they are less likely to have adult children to look out for them and are more likely to have lost a significant part of their social network during the HIV/AIDS epidemic and therefore lack the support networks that help with aging. Among the most vulnerable are low-income transgender older adults.

According to *Understanding Issues Facing LGBT Older Adults*, a landmark research done by The Movement Advancement Project and SAGE, 25% of transgender older adults report having faced discrimination based on their gender identity and much higher rates of psychological distress than their non-transgender peers. An appalling 50% live at 200% of the federal poverty line or lower

These challenges are compounded by limited caregiving options and access to healthcare. Nearly one-third of transgender people say that they don't know who will care for them when they are unable to manage their own needs for themselves and approximately two-thirds fear their access to healthcare will be limited as they get older. As a result, more than half fear they will be denied medical care as they age and subjected to discrimination by healthcare providers. Their concerns are not invalid; in a survey on LGBTQ older adults living in long-term care facilities, more than 10% of

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respondents said that they, a client, or loved one had witnessed staff refusing to call transgender residents by their preferred name or pronoun.

On September 26, 2017, the Administration for Community Living (ACL) proposed a new, longitudinal NSOAAP that would continue to collect information on the sexual orientation of OAA-funded program participants (*i.e.*, whether a respondent identifies as straight, gay, lesbian, or bisexual) but would no longer ask program participants' about their gender identity (*i.e.*, whether a respondent identifies as transgender). But this is wrong -- transgender elders are among the most vulnerable segment of our community, have demonstrably unique needs, and must be counted. We therefore urge OMB to approve ACL's request only if it conducts "cognitive testing" about whether respondents are transgender.

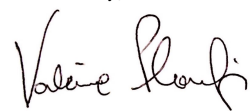
A full count by the Administration for Community Living (ACL) is essential because federally-funded aging programs like Meals on Wheels, family caregiver support, adult daycare, and senior centers support low-income older adults. Crafting language to include gender identity is not difficult -- many other federal and state agencies (notably the Centers for Disease Control, National Crime Victimization Survey, the California Health Interview, and the Behavioral Risk Factor Surveillance System (the largest ongoing health survey system in the world) have successfully implemented procedures to collect gender identity information. Another example is the Gender Identity in U.S. Surveillance (GenIUSS) Group, in that it provides a two-step approach to collecting information about gender identity. The ACL would do well to study these successfully implemented procedures.

Nor are there actual time constraints. The ACL does not anticipate administering the revised survey until June 2019, so clearly there is ample time to make any modifications needed to assess the extent to which OAA-funded programs meet the needs of transgender older adults.

OMB should not grant final approval to the revised Survey until the ACL demonstrates that it is collecting data about the participation of transgender older adults. Asking demographic questions about gender identity will increase the quality, utility, and clarity of the information collected.

Equality California urges you to direct the ACL to include a gender identity question. Collecting data and learning more about this vulnerable population will go far to helping our older transgender community live independently, minimize the burden on the aging network, and ultimately save taxpayer resources by reaching those who are most vulnerable.

Sincerely,



Valerie Ploumpis
National Policy Director
Equality California